

LAW OFFICES JOSEPH A. MASSOOD
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Attorneys for: PLAINTIFFS

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
Trenton Vicinage

Heba Awad, Osama Awad, individually and
as G/A/L for Rebecca Awad, a minor,
Anasimone Awad, a minor and Samy Awad, a
minor

Plaintiff(s),

v.

Lord and Taylor, NRDC EQUITY Partners,
Macerich Co., Freehold Township, The
Freehold Township Police Department,
Individual Freehold Police Officer
Christopher DeAngelo and Individual
Freehold Police Officer Karl White, Lord and
Taylor Security Supervisor, Individual Lord
and Taylor Security Guard 1, Individual Lord
and Taylor Security Guard 2 and ABC
CORPS 1-5 (said names being fictitious),
XYZ CORPS 1-5 (said names being
fictitious), JOHN DOES I -20, (said names
being fictitious),

Defendant(s),

CIVIL ACTION NO. 09-cv-1996

**MOTION TO REMOVE/TRANSFER
TO U.S. DISTRICT COURT**

PLEASE TAKE NOTICE that Plaintiffs, by their counsel, will move this Court, on
December 21, 2009 or on such other date and time as may be designated by the Court, for an
Order: (i) removing/transferring Docket Number MON-L-2883-08 from the Superior Court of
New Jersey, Monmouth County to the United Stated District Court for the District of New Jersey
and (ii) granting such other and further relief as the Court may deem just and proper. In support

of this Motion, Plaintiffs submit herewith the Declaration of Andrew R. Bronsnick, dated November 25, 2009.

ANDREW R. BRONSnick, ESQ.
LAW OFFICES OF JOSEPH A. MASSOOD
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Date: November 25, 2009

/s/ Andrew R. Bronsnick
ANDREW R. BRONSnick, ESQ.

CERTIFICATION OF SERVICE

I certify that the Motion to remove/transfer and Declaration of Andrew R. Bronsnick have been filed with the U.S. District Court, District of New Jersey via the ECF system.

I further certify that a copy of the aforementioned pleadings have been served upon all parties through their attorneys of record within the time allowed by the Federal Rules of Civil Procedure via ECF.

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Date: November 25, 2009

/s/ Andrew R. Bronsnick
ANDREW R. BRONSnick, ESQ.